

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Thomas J. Tucker
	)	
	)	

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**STIPULATION FOR THE ENTRY OF AN ORDER MODIFYING ORDER  
MODIFYING THE COURT’S MAY 29, 2015 ORDER REGARDING FURTHER  
PROCEEDINGS ON THE CITY OF DETROIT’S OBJECTIONS TO PROOF OF  
CLAIM NUMBER 2581 FILED BY THE COALITION OF DETROIT UNIONS, AND TO  
THE PROOF OF CLAIM NUMBER 2958 FILED BY MICHIGAN AFSCME COUNCIL  
25 AND ITS AFFILIATED DETROIT LOCALS**

The City of Detroit, Michigan (“City”), AFSCME Council 25 and Its Affiliated Detroit Locals (“AFSCME”) and the Coalition of Detroit Unions (“Coalition”) stipulate and agree as follows:

A. On February 21, 2014, AFSCME filed proof of claim 2958 (“AFSCME Claim”) which was comprised of 20 components. On that same date, the Coalition filed proof of claim 2851 (“Coalition Claim”).

B. Following a hearing on October 20, 2014, this Court ruled that (i) the liabilities referred to as “AFSCME Council 25 (13th Check ULP) MERC Case No. C12-E-092” in the AFSCME Claim are subject to treatment in Class 11 under the City’s plan of adjustment; and (ii) the liabilities referred to as “City of Detroit Retirees Health Care: Grievance No. C10 A-025” in the AFSCME Claim are subject to treatment in Class 12 under the City’s plan of adjustment. *See* Order Regarding City's Objection to Proof of Claim #2958 (Doc. No. 8015) (“Classification Order”). AFSCME has filed a Notice of Appeal of the Classification Order (Doc. No. 8139), and

this appeal (the “Classification Appeal”) was before the United States District Court for the Eastern District of Michigan, Case No. 14-14548B. The Classification Order was affirmed on September 29, 2015. (Doc. No. 10206).

C. On July 19, 2015, this Court entered the Order Modifying the Court’s May 29, 2015 Order Regarding Further Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10071) (“Order”).

C. The parties have engaged in productive discussions regarding the resolution of the Coalition Claim and the AFSCME Claim. The City and the Coalition have agreed in principle to a resolution of the Coalition Claim. The City and AFSCME have agreed in principle to a resolution of the bulk of the AFSCME Claim; provided, however, that the claims subject to the Classification Appeal will not be included in the resolution and the parties are still discussing potential ways to resolve the claim referred to as “Local 207, 2394 and 2920 DWSD refusal to bargain / Case Number C13 D-069” in the AFSCME Claim (“Claim Number 4”). Further, the parties need to confirm the resolution and memorialization of certain claims concerning pending grievances and contract disputes.

D. To allow the parties additional time to finalize their agreements in principle and to further discuss the above-referenced AFSCME claims, the parties request that this Court extend the deadlines contained in the Order.

NOW, THEREFORE, the City, AFSCME and the Coalition stipulate and agree as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from September 30, 2015 to November 30, 2015.

2. The filing deadlines in paragraph 1.B of the Order are extended from November 30, 2015 to January 30, 2016.

3. The filing deadlines in paragraph 1.C of the Order are extended from December 31, 2015 to February 29, 2016.

4. The filing deadlines in paragraph 1.D of the Order are extended from October 14, 2015 to December 13, 2015.

SO STIPULATED:

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ATTORNEYS FOR THE CITY

DATED: September 30, 2015

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**ORDER MODIFYING ORDER MODIFYING THE COURT’S MAY 29, 2015 ORDER  
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OBJECTIONS TO PROOF OF CLAIM NUMBER 2581 FILED BY THE COALITION  
OF DETROIT UNIONS, AND TO THE PROOF OF CLAIM NUMBER 2958 FILED BY  
MICHIGAN AFSCME COUNCIL 25 AND ITS AFFILIATED DETROIT LOCALS**

This matter having come before the Court on the Stipulation for the Entry of an Order Modifying Order Modifying the Court’s May 29, 2015 Order Regarding Further Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (“Stipulation”). Based on the Stipulation,

**IT IS ORDERED THAT:**

1. The Court’s July 19, 2015 Order entitled “Order Modifying the Court’s May 29, 2015 Order Regarding Further Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals” (Doc. No. 10071, “Order”) is modified as follows:

A. The filing deadlines in paragraph 1.A of the Order are extended from September 30, 2015 to November 30, 2015.

B. The filing deadlines in paragraph 1.B of the Order are extended from November 30, 2015 to January 30, 2016.

C. The filing deadlines in paragraph 1.C of the Order are extended from December 31, 2015 to February 29, 2016.

D. The filing deadlines in paragraph 1.D of the Order are extended from October 14, 2015 to December 13, 2015.